

Town & Country Planning  
Act 1990 (as Amended)

Appeal by Headlands  
Way Limited

Land North of Chiswell  
Green Lane, Chiswell  
Green, St Albans  
Hertfordshire, AL2 3AJ

Proof of Evidence by M Stevens  
MIHT on behalf of Headlands Way  
Limited

PINS Ref: APP/B1930/W/22/3312277

LPA Ref: 5/2021/3194

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**MILESTONE**  
TRANSPORT PLANNING

# Land North of Chiswell Green Lane, Chiswell Green, St Albans, Hertfordshire AL2 3AJ

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## Document history and status

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MTP4	Appeal Site Highways & Transport Infrastructure Plans Package

## 1. Experience & Qualifications

- 1.1 My name is Matt Stevens. I am a Member of the Institution of Highways and Transportation and a Company Director of the firm Milestone Transport Planning Limited ("MTP"), whose address is 7 Ancells Court, Rye Close, Fleet, Hampshire, GU51 2UY.
- 1.2 I have 32 years' experience dealing with the traffic and transportation implications of a wide range of private and public sector projects in locations throughout the country with full assessment under National and Local Planning Policy Guidance. I have good working relationships with a significant number of nationally recognised commercial developers and local authorities.
- 1.3 I advise clients on all technical aspects from the initial concept of scheme in terms access, layout and off-site considerations, the identification of practical transport solutions, through to the preparation of Transport Assessments, Travel Plans and Environmental Statements, negotiation of planning consents and subsequently through to discharging planning conditions, negotiations with respect to measures / contributions required for Section 106 and Section 278 Agreements and implementation of schemes.
- 1.4 I also have experience in the planning and design of highways infrastructure, including site access solutions, off-site highway schemes including the identification of both small and large scale improvement measures, traffic management and calming strategies, road marking and signing schemes. In addition, I have experience of developing transport infrastructure solutions including schemes for enhancement of pedestrian, cycle and public transport routes and access to development, as well as the identification of both physical and management solutions to encourage access by non-car modes of travel through the preparation of Travel Plans.
- 1.5 MTP were instructed by Headlands Way Limited to provide highways and transport advice and documentation to accompany the original planning application. I am therefore familiar with the Appeal Site for the purposes of giving evidence.
- 1.6 The evidence which I have prepared and provide for this Appeal (PINS Ref: APP/B1930/W/22/3312277) in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of the Institute of Highways & Transport as my professional institution and I confirm that the opinions expressed are my true and professional opinions.

## 2. Introduction & Scope of Evidence

### Overview

2.1 This document has been prepared by MTP on behalf of Headlands Way Limited and forms the Proof of Evidence (PoE) to support an appeal against St Alban's and City District Council's ("SADC") decision to refuse planning permission on 25 October 2022 (SADC Ref: 5/2021/3194) for the demolition of existing buildings, and the building of up to 330 discounted affordable homes for Key Workers, including military personnel, the creation of open space and the construction of new accesses and highway works including new foot and cycle path and works to junctions.

### Planning History

2.2 An outline application was submitted to SADC in November 2021. The outline application was supported by a Transport Assessment ("TA") and Residential Travel Plan ("RTP"), prepared by MTP. To inform the scope of the TA and RTP, pre-application engagement meetings and consultation were conducted with Hertfordshire County Council ("HCC"), as Highway Authority and consultee of the planning application process, in April and August 2021.

2.3 The pre-application dialogue with HCC was focussed on the key topics of:

- The site's accessibility credentials and potential for future households to adopt sustainable travel patterns and behaviour for a variety of journey purposes.
- The baseline conditions of the local highway network with regards to operational and safety characteristics.
- The proposed access arrangements, parking, delivery / servicing, and emergency access arrangements, recognising that details of the internal layout were illustrative at this juncture with matters to be considered at the Reserved Matters stage, but nevertheless inform the wider movement and access strategy to be determined under this outline application.
- The assessment of the multi-modal trip generation arising from the development proposals and associated assessment of impacts on the local highway and transport networks over the course of a typical weekday including the AM and PM peak hour periods.

- 2.4 Following submission of the planning application, HCC provided a consultation response in February 2022 that outlined a recommendation for refusal based on the development proposal failing *“to comply with Hertfordshire County Council’s Local Transport Plan policies relating to sustainable development (Policies 1. Transport User Hierarchy, 5. Development Management). Specifically, further explanation regarding bus services and access to bus services is required and further investigation into cycling infrastructure beyond Chiswell Green local shops.”*
- 2.5 MTP then submitted a Transport Assessment Addendum (“TAA”) in May 2022 to address the initial objection received from HCC. Within the TAA further details were provided at the specific request of HCC with regard to:
- A plan to show how footpath St Stephen 082, which forms part of the County’s Public Rights of Way (“PROW”) network, can be upgraded to enhance the site’s permeability on-foot and by cycle, in accordance with the principles set out in HCC’s ‘Non-Motorised Routes: A Design Guide’ (August 2020).
  - A plan to show the design of a secondary / emergency access off the western side of The Croft, to enhance the site’s permeability on-foot and by cycle.
  - An assessment of the vehicular trip generating potential of the former Garden of the Rose / Butterfly World visitor attractions located opposite the site, and associated impact on Chiswell Green Lane, recognising the extant use is likely to generate a significant volume of vehicular traffic movements over the course of a typical weekend as opposed to a weekday.
  - A plan / assessment on how off-street parking can be accommodated within the proposed Memorial Car Park, preventing the removal of mature trees off the southern side of Chiswell Green Lane to resolve concerns on displaced / overspill parking from existing households.
  - An assessment of car driver, public transport, walk and cycle trips to / from the site through using 2011 Census origin and destination data from the Nomis website. The purpose of the exercise being to establish the proportion of car trips, which can be replaced by walking, cycling and public transport, particularly the significant potential to encourage future households to travel by cycle to various destinations in St Albans as the distance is below the recommended 5.0-kilometres.

- An audit, together with an opportunity and constraints plan, to identify existing barriers and scope to enhance cycling routes between the site and St Albans - based on the SADC Cycling Map, there is existing on-carriageway cycle lane provision along either side of the B4630 Watford Road, near the road bridge over the A414 and the potential is identified to install a Toucan crossing facility to cater for cycle movements to / from St Albans.
- An investigation on how on-foot access to the nearest bus stops along either side of the B4630 Watford Road can be enhanced alongside liaison with HCC's Public Transport Officer and operators (i.e. Arriva, The Shires) to establish the potential to divert or upgrade existing bus services to reduce walk journey times and increase the likelihood of future households to travel by public transport for various journey purposes.
- A review of the two-strand approach for securing appropriate supporting infrastructure, as set out in HCC's 'Guide to Developer Infrastructure Contributions' (2021) publication.

2.6 In August 2022, HCC then provided a further response to SADC based upon the findings within the TAA. Within that response it states:

*"... the applicant produced a Transport Assessment Addendum to supplement the original submission. The addendum includes additional clarification and supporting measures which overcome the points I have previously raised. Therefore, I confirm the local highway authority wishes to remove the previous recommendation for refusal."*

2.7 This positive recommendation is subject to the willingness of the applicant to enter into a Section 106 Agreement to secure a financial contribution towards supporting infrastructure.

2.8 Copies of both the February 2022 and August 2022 responses from HCC are included as **Appendix MTP1** to my Proof of Evidence.

2.9 National Highways provided formal consultation comments on the outline application in September 2022 recommending that planning permission not be granted for a specific period and requesting that consideration be given to the impact of the proposals on M25 Junction 21A and Park Street Roundabout.

2.10 Subsequently, and in connection with the neighbouring, conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110, LPA Ref: 5/2022/0927, information was provided to National Highways in the form of existing queuing and general traffic conditions at both junctions.

- 2.11 The above-referenced information provided confidence to National Highways that the cumulative impact of both the Appeal Site and the conjoined Appeal Site will not have a detrimental impact on the operation of these junctions and, therefore, no further comments were made regarding the matter, and no objection was offered to the application.
- 2.12 A copy of the final formal recommendation from National Highways dated 30 September 2022 is included as **Appendix MTP2** to my Proof of Evidence.
- 2.13 Keep Chiswell Green ("KCG") lodged consultation comments on the outline application through a statement prepared by Mr Jed Griffith dated August 2022 and a Transport Note produced by THaT consultancy in October 2022.
- 2.14 The statement prepared by Mr Jed Griffith (August 2022), with my paraphrasing, concluded that:
- *"The Transport Statement and its Addendum have failed to provide adequate measures to attenuate the effect of the additional traffic that would arise from the proposed development (paragraph 177.)"*
  - *"This development would cause significant harm to the local area and its population ... a significant cumulative impact on highway safety and on the operational capacity of the surrounding transport network (paragraph 186.)"*
  - *"The impact of the development on the existing village of Chiswell Green will be demonstrably injurious, and ... the suggested proposals to mitigate the damage caused by the resultant increase in vehicular traffic will not create the long-term sustainable changes in travel behaviours (paragraph 187.)"*
- 2.15 It is noteworthy that the Transport Note prepared by THaT consultancy (October 2022) reviewed highways and transport matters associated with both Appeal Sites being considered by the Inspector at this Inquiry even though, at the time of publication of the report, the Statutory Authorities had only ever considered each application in isolation.
- 2.16 The conclusions and recommendations from the THaT consultancy (October 2022) Transport Note are replicated in the Statement of Case prepared by KCG as a Rule 6 Party to this conjoined Inquiry for the determination of the two Appeal Sites.
- 2.17 These, along with the further findings that KCG highlight in their Statement of Case are considered in detail within Section 3 of my Proof of Evidence.

2.18 I do, however, draw the attention of the Inspector to **Appendix MTP3** to my Proof of Evidence which provides a response, dated November 2022, from HCC, as Highway Authority, to SADC in response to the KCG comments, and particularly those contained within the THaT consultancy Transport Note in which they state:

*"I can confirm that the fundamental principle of accepting a sustainable transport scheme over and above a highway capacity solution (which the report majors on), is one that we remain content with."*

2.19 Consistent with the positive recommendation from HCC and National Highways, both as Highway Authorities and therefore a key statutory consultees of SADC in respect of determining the outline application, although SADC refused planning permission on 25 October 2022, citing two reasons for refusal, neither of them related to highways and / or transport matters.

## Agreed Plans

2.20 **Appendix MTP4** to my Proof of Evidence provides a full set of plans agreed with HCC prior to the determination of the planning application. As brought to the attention of and agreed with the Inspector, prior to the Appeal, two of the plans include amendments that reflect updated and detailed land boundary considerations agreed with the Land Registry, post the determination of the planning application. These amended plans are highlighted in bold in the full list below:

- [Plan 21086/001 Rev B - Proposed Primary Access Arrangements](#)
- [Plan 21086/002 – Proposed Foot / Cycle Amendments](#)
- [Plan 21086/002/1 – Proposed Foot / Cycle Amendments \(Stanley Avenue\)](#)
- [Plan 21086/002/2 – Proposed Foot / Cycle Amendments \(Watford Road\)](#)
- [Plan 21086/003 – Proposed PROW Improvements \(St Stephens 082\)](#)
- [Plan 22185/004 Rev A – Proposed PROW Improvements \(St Stephens 080\)](#)
- [Plan 22185/005 Rev B – Proposed Memorial Car Park](#)
- [Plan 21086/006 – Proposed Crossing Upgrade \(Watford Road\)](#)

## Relevant Planning Policies

2.21 Within my Proof of Evidence, I will refer to Planning Policies and Guidance that specifically relate to the highways and transport aspects of this Appeal. Specifically, this will include:

- **National Policy:**
  - National Planning Practice Guidance (“NPPG”) on *‘Transport evidence bases in plan making and decision taking’* and *‘Travel plans, transport assessments and statements in decision taking’*.
  - National Planning Policy Framework (2021) (“NPPF”)
- **County Policy:**
  - Hertfordshire Local Transport Plan 4 (“LTP4”) (2018)
- **Local Policy:**
  - St Albans City & District Council Local Plan Review ‘Saved’ Policies (September 2007)

## Statement of Common Ground

2.22 On the basis that HCC removed any recommendation for refusal on the scheme, MTP have sought to agree a Statement of Common Ground (“SoCG”) with the HCC to confirm their position.

2.23 The SoCG submitted alongside my Proof of Evidence demonstrates the significant level of agreement reached with HCC as Highway Authority in respect of comprehensively addressing the highways and transport impacts arising from the Appeal Site proposals in accordance with National and Local Planning Policy objectives.

### 3. Key Issues

3.1 As referenced in Section 2 of my Proof of Evidence, KCG have submitted to the Inspector a Statement of Case (March 2023) which asserts that traffic and transport is material consideration in the determination of the conjoined Appeal Sites, notwithstanding the positive recommendations on both Appeal Sites from HCC and the 'no objection' offer from National Highways at the application stage, as evidenced within the SoCG.

3.2 The THaT Transport Note (October 2022) is submitted to the Inquiry as a Core Document by KCG, as a Rule 6 Party, with the conclusions and recommendations embodied within the text of the Statement of Case.

3.3 In this section of my Proof of Evidence I consider each of these conclusions and recommendations, in detail but, for ease of reference, have grouped these into key topic areas, namely:

- Cumulative impact on the safety and capacity of the local highway network;
- The balanced approach to mitigation;
- The sustainable travel credentials of the conjoined Appeal Sites; and
- The function and character of Chiswell Green Lane.

#### Cumulative Impact

3.4 The KCG case asserts that the local highway network, and in particular the B4630 Watford Road / Tippendell Lane / Chiswell Green Lane double mini-roundabout in the centre of the village, operates at capacity at present and that the additional traffic arising from either one, or both Appeal Sites will lead to a significant worsening of the situation, exacerbating serious highway safety and capacity concerns.

3.5 Dealing firstly with the KCG case that traffic arising from either one of the Appeal Sites being granted planning permission will lead to a significant worsening of existing conditions. Both Appellants have submitted detailed assessment of the future operational characteristics of the B4630 Watford Road / Tippendell Lane / Chiswell Green Lane double mini-roundabout within the respective Transport Assessments ("TA's"), and the results of these have been considered in detail by the Highway Authority, HCC, prior to them issuing their formal comments to SADC.

- 3.6 The robust assessments included within the respective TA's fully took account of the effects of known committed developments, including the Radlett Freight Terminal (SADC Ref. 5/09/0708) and the proposed hotel development to the south of the Noke Roundabout (SADC Ref. 5/2015/0722). In addition, industry standard growth rates were applied to surveyed flows to generate future year (5-years post submission of the application, i.e., 2026) baseline, background traffic on the network whereby these growth rates were unadjusted and not taking account of the known changes in wider travel habits as a consequence of the COVID-19 pandemic. Finally, and to ensure a robust assessment was undertaken, no discounting of trip rates was undertaken to take account of the trip generational modal shift adjustments based on the implementation of the Travel Plan measures.
- 3.7 In the context of both Appeal Sites, and based on the robust capacity assessments undertaken, HCC have deemed that the impacts arising from both developments, individually, on the operational characteristics of the B4630 Watford Road / Tippendell Lane / Chiswell Green Lane double mini-roundabout, do not, in the context of paragraph 111 of the NPPF, present a severe impact and do not warrant a recommendation to refuse.
- 3.8 HCC acknowledge that there is a reduction in operational performance of the junction as a consequence of development-related traffic generation. However, HCC take a balanced view and consider that creating additional highway capacity is not a long-term solution to reduce reliance on private car travel in accordance with the objectives in their LTP4 Policy 1 and the NPPF. HCC further acknowledge that, in any event, there is limited opportunity to improve capacity at the junction given the land constraints that exist in and around the B4630 Watford Road / Tippendell Lane / Chiswell Green Lane double mini-roundabout.
- 3.9 Secondly, I address matters concerning the cumulative effect of traffic generated by both Appeal Sites. It is evident that based upon the information provided by both TA's, considered against paragraph 111 of the NPPF and LTP4 Policy 1, HCC, as Highway Authority, came to the clear, balanced judgement that this further cumulative assessment was not needed and both Appeal Sites could proceed.
- 3.10 Accordingly, and having also given consideration to the representations made by KCG prior to determination, neither planning application was objected to by HCC as Highway Authority. Furthermore, and as evidenced by the SADC Decision Notices on both applications, no evidence has been produced by HCC to justify Reasons for Refusal on highway matters.

- 3.11 Thirdly, it has been demonstrated within the TA's that accompanied the original applications that the local highway network, including Chiswell Green Lane and the B4630 Watford Road corridors, has a good road safety record.
- 3.12 From detailed analysis of road safety data supplied by HCC for assessment purposes, it is evident that the causation of the incidents that have occurred is mainly down to human error rather than any deficiencies in the geometric design or operational characteristics of the roads themselves. There is no evidence to suggest that any increased demand attributable to the conjoined Appeal Sites will further exacerbate the road safety record.
- 3.13 Taking all of these elements into account, the balanced judgement taken by HCC as Highway Authority and statutory consultee on whether any impacts are severe is the Policy based hierarchical approach where so long as highway safety is not compromised, the operational capacity of the local highway network is given less weight than the need to maximise opportunities to address the needs of other road users, i.e. active travel (walking and cycling) and passenger transport modes. I discuss this further in the following sub-section of my Proof of Evidence.
- 3.14 HCC, as Highway Authority and statutory consultee, have reinforced this balanced judgement approach in their final recommendations on each of the planning applications prior to determination. Of note, HCC also reference the same balanced judgement approach in the commentary they provide on the THaT Consultancy Transport Note which is a key thread of the Rule 6 party's evidence base.

### Balanced Mitigation

- 3.15 The Policy direction at both central and local government levels, as outlined in the NPPF and LTP4 Policy 1, promotes mitigation and intervention that follows a hierarchical approach, focusing and placing greater priority on delivering enhanced provisions for active travel modes (walking and cycling) and passenger transport as a means of reducing car-based travel. At all Policy levels, highway improvements that deliver additional traffic capacity should only be considered as a last resort.
- 3.16 Paragraph 104 part c) of the NPPF requires that: *"...opportunities to promote walking, cycling and public transport use are identified and pursued..."*. Paragraph 105 goes on to state that: *"...significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes..."*.

3.17 Paragraph 108, in part a) requires that: *"...appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, given the type of development and its location."*

3.18 Perhaps the most important paragraph within the NPPF that specifically references the hierarchical approach to balanced mitigation is Paragraph 112, which specifically requires that applications for development should:

*" ...*

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

*b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

*c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

*d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*

*e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."*

3.19 HCC's LTP4 reinforces and complements NPPF policies, setting out how transport can help deliver a positive future vision for Hertfordshire. As well as providing for safe and efficient travel, the Plan has a major input into wider policies such as economic growth, meeting housing needs, improving public health, and reducing environmental damage.

3.20 Specifically, LTP4 Policy 1 requires development proposals to prioritise the hierarchy of users where emphasis is placed on:

- *Opportunities to reduce travel demand and the need for travel;*
- *Vulnerable road user needs (pedestrians and cyclists);*

- *Passenger Transport user needs;*
- *Powered two-wheeler (mopeds and motorbikes) user needs; and*
- *Other motor vehicle needs.*

- 3.21 This approach has been taken in the development of the movement and access strategies for both Appeal Sites and has been a constant theme through pre-application dialogue with SADC, HCC, and National Highways as statutory authorities, and in the consideration of both planning applications.
- 3.22 It is accepted that, for the foreseeable future and with any existing and future development proposal, the car is and will remain the primary mode of transport.
- 3.23 It is in this context that the overarching NPPF and LTP4 Policy objective is to increase the attractiveness and use of sustainable modes of travel; and the optimal way to achieve this is by enhancing available infrastructure. What is evidenced, both within the original TA submissions that accompanied the respective planning applications, summarised within the SoCG, as well as in my Proof of Evidence is the comprehensive and significant package of Policy compliant off-site active travel (walking and cycling) and passenger transport infrastructure improvements that will be delivered by the Appeal Sites.
- 3.24 This package of off-site infrastructure improvements has been the subject of a carefully considered design development process between the Appellants and HCC as Highway Authority throughout the planning application process, and will deliver a balanced approach to addressing the future travel demands of residents and visitors to both Appeal Sites, maximising opportunities for walking, cycling and passenger transport access and reducing reliance on private car trips, particularly for localised journey purposes.
- 3.25 Even considering just this Appeal Site (PINS Ref: APP/B1930/W/22/3312277), the package of off-site infrastructure improvements will deliver:
- *A safe and direct shared footway / cycleway between the Appeal Site and the local shops, amenities and bus stops within Chiswell Green village;*
  - *An upgrade to crossing facilities on the B4630 Watford Road for the benefit of walking and cycling journeys and existing infrastructure further afield towards St Albans City Centre;*
  - *Upgrades to Public Rights of Way surrounding the Appeal Site for leisure journey purposes;*

- Targeted and focussed Travel Plans measures and incentives; and
- A substantial contribution towards enhancing and upgrading local bus services.

3.26 Of note, a similar comprehensive package of off-site infrastructure improvements is to be delivered with the conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110) that, combined, will ensure that the future travel demands associated with both the existing and new population of Chiswell Green are accommodated in a Policy-compliant and sustainable manner.

3.27 Evidently there are elements of both off-site infrastructure packages that are duplicated and, therefore, the opportunity exists, if required or deemed necessary by HCC, to redirect a proportion of this investment towards further infrastructure improvements that, in line with Policy objectives, reinforce and strengthen the mitigation package, for the benefit of new and existing residents.

### Appeal Site Accessibility by Sustainable Travel

3.28 The Appeal Sites provide for safe, attractive, and sustainable communities. Future residents within the conjoined Appeal Sites will have a genuine choice of transport modes available and these sites, as is the case with the rest of Chiswell Green village, will not become car-based dormitories.

#### Active Travel Modes (Walking & Cycling)

3.29 As evidenced within the original TA / TAA submissions that accompanied the planning applications and summarised within the SoCG, there is a range local amenities covering a wide range of journey purposes for future households within the Appeal Site that are within the widely regarded industry standard thresholds for maximum travel distances by foot (2.0 kilometres) and cycle (5.0 kilometres) as identified by the Chartered Institute of Highways & Transportation ("CIHT").

3.30 The list of agreed local amenities, distances and journey times by foot and cycle are shown overleaf. To access these local amenities, there are a considerable number of local roads that are identified as quieter routes, with some busy sections, for cycle journeys within the St Albans City & District Cycle Route Plan including Chiswell Green Lane, Stanley Avenue, Ragged Hall Lane, Allandale, Crossfields, Westfields, Abbey Avenue, Robert Avenue, Vesta Avenue, Tavistock Avenue, Abbots Avenue West, and Berners Drive.

3.31 In addition, Robert Avenue, Vesta Avenue, Tavistock Avenue, Abbots Avenue West, and Berners Drive form part of the signed National Cycle Network (NCN) Route 6 which also connects with NCN61 The Alban Way.

#### Summary of Local Amenities & Accessibility by Active Modes of Travel

Type of Amenity	Destination	Distance (Kilometres)	Walk Journey Time /mins	Cycle Journey Time /mins
Convenience	Co-op Foodstore	0.6	7	3
	Simmons Bakers	0.7	9	3
	Watford Rd Post Office	0.8	9	3
Education	Killigrew Primary and Nursery School	1.3	16	5
	How Wood Primary	2.1	24	8
	St Colomba's College	2.4	30	8
	The Marlborough Science Academy	2.7	34	10
Employment	St Albans City Centre	4.0	-	15
Faith	Homewood United Reformed Church	1.0	13	4
	St Stephens Church	2.3	29	8
Healthcare	Globe Pharmacy	0.65	8	3
	Midway Surgery	1.3	16	5
Leisure and Fitness	Chiswell Green Livery & Riding School	0.2	2	1
	Greenwood Park & Lawn Tennis Club	1.2	15	4
	Westminster Lodge Leisure Centre	2.8	35	9
	Abbey Theatre	2.8	35	9
Retail	Abbey View Retail Park	3.1	-	10
	St Albans City Centre	4.0	-	15

3.32 As demonstrated, there is a wide range of local amenities including retail, education, employment, health, and leisure facilities as well as passenger transport stops, that are accessible by foot and cycle along existing and improved, safe, convenient, and direct routes from the Appeal Site.

- 3.33 The potential provision of a school on the conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110) also delivers to reduce overall travel demand on the wider network.

### Local Bus Services

- 3.34 Existing and future residents have safe and direct access to fast, direct, frequent bus services along the B4630 Watford Road corridor that connect with key destinations within St Albans and Watford and surrounding districts. As evidenced within the TA / TAA submissions that accompanied the original planning applications, and the SoCG, there are five bus stops within a 1.0 kilometre or 10 minute walk distance of the Appeal Sites.
- 3.35 The nearest bus stops are located on either side the B4630 Watford Road, near and opposite the Three Hammers Public House with both northbound and southbound bus stops benefiting from sheltered seating, flagpoles, accessible raised kerbs and timetable information. In addition, there are bus stops further north on the B4630 Watford Road at West Avenue and bus stops on Tippendell Lane to the east of the double mini roundabout junction with the B4630 Watford Road.
- 3.36 The choice of future households to use bus services are likely to be influenced by other factors such as the topography, quality, and safety of the walking route to the bus stops as well as distance. The routes used to access these bus stops already benefit from being level, lit, and overlooked by existing residential properties; and will further benefit greatly from the significant investment of off-site active travel infrastructure upgrades to be delivered by the development.
- 3.37 The CIHT document 'Buses in Urban Developments' (2018) states:

*"The acceptability of the walking distance is not a stand-alone consideration. People take account of the total journey travel time, including the 'in bus' time as well as the walk at either end.*

*Consequently, people will accept longer walks to reach bus services that are fast and direct, or more frequent, and to stops serving a wider range of destinations".*

- 3.38 The bus stops in proximity of the Appeal Sites offer direct connections to a range of destinations within the St Albans and Watford areas where offsetting overall journey time against the cost and challenges associated with town centre parking could be beneficial to future residents.

3.39 It is also the case, as evidenced, in the SoCG, that both Appeal sites are offering considerable future investment in upgrading, enhancing, and securing the long-term viability of future bus service provision.

### Function & Character of Chiswell Green Lane

3.40 The place function of the section of Chiswell Green Lane within the village is enhanced by the comprehensive package of off-site infrastructure improvement measures, specifically:

- The delivery of the shared footway / cycleway between the Appeal Site access and the B4630 Watford Road;
- The regulation of the on-street parking with capacity to transfer these vehicles off-street into the Memorial car park; and
- The introduction of features that reduce traffic speeds through the narrowing of the carriageway with give-way controls alongside the extension of the transition between the 30mph and 60mph speed limits.

3.41 Combined, these measures will substantially improve conditions for vulnerable road users and will maintain the 'street' characteristics of this section of Chiswell Green Lane.

3.42 The character of Chiswell Green Lane to the west of the village is also preserved and protected through the design of the proposed site access arrangements to deter rat running and maintain its function as a rural quiet lane. This approach is also agreed with HCC as Highway Authority, as evidenced through the SoCG.

## 4. Summary & Conclusion

- 4.1 This Proof of Evidence has been prepared by Mr Matt Stevens MCIHT on behalf of Headlands Way Limited to support an appeal against SADC's decision to refuse planning permission for a development proposal comprising the erection of 330 residential units (Use Class C3) of mixed size and type together with associated cycle / refuse storage, car parking, and soft landscaping on land north of Chiswell Green Lane in Chiswell Green, Hertfordshire.
- 4.2 Matters related to traffic and transport did not constitute a Reason for Refusal in the determination of the Appeal site planning application as evidenced by the positive recommendation by HCC in August 2022 having considered the detail with in the originally submitted TA (November 2021) and the subsequent TAA (May 2022) and the no objection offered by National Highways in their response dated September 2022.
- 4.3 Contrary to the assertion of the THaT Consultancy Transport Note (October 2022), traffic and transport was not a material consideration at the time of determining the planning application and there is no evidence before the Inspector at this Inquiry to suggest that it is a material consideration now.
- 4.4 A key thread of the argument put forward within the KCG Statement of Case is the cumulative impact of the conjoined Appeal Sites on the highway safety and operational capacity of the local highway network, in particular the double mini-roundabout junction of the B4630 Watford Road with Tippetdell Lane and Chiswell Green Lane.
- 4.5 It is evident that based upon the information provided by both TA's, considered against paragraph 111 of the NPPF and LTP4 Policy 1, HCC, as Highway Authority, came to the clear, balanced judgement that this further cumulative assessment was not needed and both Appeal Sites could proceed.
- 4.6 Perhaps, more importantly, the judgement taken by HCC as Highway Authority and statutory consultee on whether any impacts are severe is the Policy based hierarchical approach whereby so long as highway safety is not compromised, the operational capacity of the local highway network is given less credence than the need to maximise opportunities to address the needs of other road users, i.e. active travel (walking and cycling) and passenger transport modes.

- 4.7 Accordingly, and having also given consideration to the representations made by KCG prior to determination, neither planning application was objected to by HCC as Highway Authority. Furthermore, and as evidenced by the SADC Decision Notices on both applications, no evidence has been produced by HCC to justify Reasons for Refusal on highway matters.
- 4.8 It has been demonstrated within the TA that accompanied the original application that the local highway network, including Chiswell Green Lane and the B4630 Watford Road corridors, has a good road safety record and that the causation of the incidents that have occurred is mainly down to human error rather than any deficiencies in the geometric design or operational characteristics of the roads themselves. There is no evidence to suggest that any increased demand attributable to the conjoined Appeal Sites will further exacerbate the road safety record and this has not been raised as a concern by either the statutory authorities, namely HCC and National Highways or by the Rule 6 parties.
- 4.9 What is evidenced is the comprehensive and significant package of Policy compliant off-site active travel (walking and cycling) and passenger transport infrastructure improvements, as detailed in the SoCG, that will be delivered by the conjoined Appeal Sites, which should be given significant weight should the Inspector be minded to grant planning permission.
- 4.10 This package of off-site infrastructure improvements has been the subject of a carefully considered design development process between the Appellants and HCC as Highway Authority throughout the planning application process and will deliver a balanced approach to addressing the future travel demands of residents and visitors to both Appeal Sites, maximising opportunities for walking, cycling and passenger transport access and reducing reliance on private car trips, particularly for localised journey purposes.
- 4.11 Even considering just this Appeal Site (PINS Ref: APP/B1930/W/22/3312277), the subject of my Proof of Evidence, the package of off-site infrastructure improvements will deliver a safe and direct shared footway / cycleway between the Appeal Site and the local shops, amenities and bus stops within Chiswell Green village, an upgrade to crossing facilities on the B4630 Watford Road for the benefit of walking and cycling journeys and existing infrastructure further afield towards St Albans City Centre, upgrades to Public Rights of Way surrounding the Appeal Site for leisure journey purposes as well as targeted and focused Travel Plans measures and incentives along with a substantial contribution towards enhancing and upgrading local bus services.

- 4.12 A similar comprehensive package of off-site infrastructure improvements is to be delivered with the conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110) that, combined, will ensure that the future travel demands associated with both the existing and new population of Chiswell Green are accommodated in a Policy compliant sustainable manner.
- 4.13 Evidently there are elements of both off-site infrastructure packages that are duplicated and therefore, should the Inspector be minded to grant permission, there is the opportunity, if required or deemed necessary, to redirect a proportion of this investment towards further infrastructure improvements that, in line with Policy objectives, reinforce and strengthen the mitigation package, for the benefit of new and existing residents.
- 4.14 That said, compelling evidence has been agreed with HCC as Highway Authority as detailed in the SoCG, and is put forward to the Inspector, that the Appeal Sites are safe, attractive, and sustainable communities. As demonstrated, there is a wide range of local amenities including retail, education, employment, health and leisure facilities as well as passenger transport stops that are accessible by foot and cycle along existing and improved, safe, convenient and direct routes from the Appeal Site.
- 4.15 The potential provision of a school on the conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110) also delivers to reduce overall travel demand on the wider network.
- 4.16 Contrary to the Rule 6 party's case, future residents within the conjoined Appeal Sites will have a genuine choice of transport modes available and that these sites, as is the case with the rest of Chiswell Green village, will not become car-based dormitories. Existing and future residents have safe and direct access to fast, direct, frequent bus services along the B4630 Watford Road corridor that connect with key destinations within St Albans and Watford and surrounding districts.
- 4.17 As evidenced, in the SoCG, both Appeal sites are offering considerable future investment in upgrading, enhancing, and securing the long-term viability of future bus service provision.
- 4.18 Finally, the assertion within the Rule 6 party's case that the function and character of Chiswell Green Lane as a consequence of the additional traffic generated by the conjoined Appeal Sites is simply incorrect.

- 4.19 Compelling evidence is before the Inspector from the Appellants, and agreed with HCC, to enhance the place function of the section of Chiswell Green Lane within the village, emphasising and substantially improving conditions for vulnerable road users such as pedestrians and cyclists with the introduction of the shared footway / cycleway and improved crossing facilities. In addition, the comprehensive package of off-site infrastructure regulates on-street parking and introduces speed reduction features that further manages and maintains the "street" characteristics of Chiswell Green Lane.
- 4.20 The character of Chiswell Green Lane to the west of the village is also preserved and protected through the design of the proposed site access arrangements to deter rat running and maintain its function as a rural quiet lane. This approach is also agreed with HCC as Highway Authority, as evidenced through the SoCG.
- 4.21 In overall conclusion, in my view the development has been shown to accord with the policies set out in LTP4 Policy 1 (Transport User Hierarchy) and Policy 5 (Development Management) as well as Paragraph 111 of the NPPF (July 2021)
- 4.22 On the basis of the evidence provided in this Proof of Evidence, I therefore respectfully request that the Inspector allows this Appeal.

## Appendix MTP1

Mark Youngman  
Development Management Group Manager  
Hertfordshire County Council  
Postal Point CHO242  
County Hall  
Pegs Lane  
Hertford  
SG13 8DE

**Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)**

Director of Planning	District ref.	5/2021/3194
St Albans and City District Council	HCC ref.	
Civic Centre	HCC received:	
St Peter's Street	Area manager:	James Dale
Hertfordshire	Case officer:	James Dale
AL1 3JE		

**Location**

St Stephens Green Farm Chiswell Green Lane St Albans Hertfordshire

**Application Type**

Outline Application

**Application Details**

Outline application (access sought) for demolition of existing buildings, and the building of up to 330 discounted affordable homes for Key Workers, including military personnel, the creation of open space and the construction of new accesses

**Decision**

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommend this planning application is **refused** for the following reason:

The proposal fails to comply with Hertfordshire County Council's Local Transport Plan policies relating to sustainable development (Policies, 1. Transport User Hierarchy, 5. Development Management). Specifically, further explanation regarding bus services and access to bus services is required and further investigation into cycling infrastructure beyond Chiswell Green local shops.

**Description of the Proposal**

This application is for the development of St Stephens Green Farm (including the demolition of the existing buildings within the site) and the construction of 330 residential units. The proposed development site is located to the east of Chiswell Green adjacent to the northern side of Chiswell Green Lane.

A Transport Assessment (TA), which includes a Travel Plan has been submitted with this application.

**Primary Vehicular Access**

The site has two opportunities to connect to routes classified as public highway in Chiswell Green Lane and The Croft. The development proposal includes a main vehicle access to Chiswell Green and a secondary access restricted to emergency/cycling/walking to The

Croft. In addition, the development proposes to utilise upgraded rights of way adjacent to the site (although it is not clear what the extent of the way upgrade consists).

The primary access vehicular, pedestrian and cycle access to the proposed development would be achieved by the creation of a priority give-way junction located off the northern side of Chiswell Green Lane

As shown on Drawing No. 21-086 / 001 Rev B, the geometric design of the access would take the form of a simple junction with 6.0-metre kerb radii and a 5.5-metre-wide access road, sufficient to accommodate the simultaneous entry and exit movements of various sized vehicles.

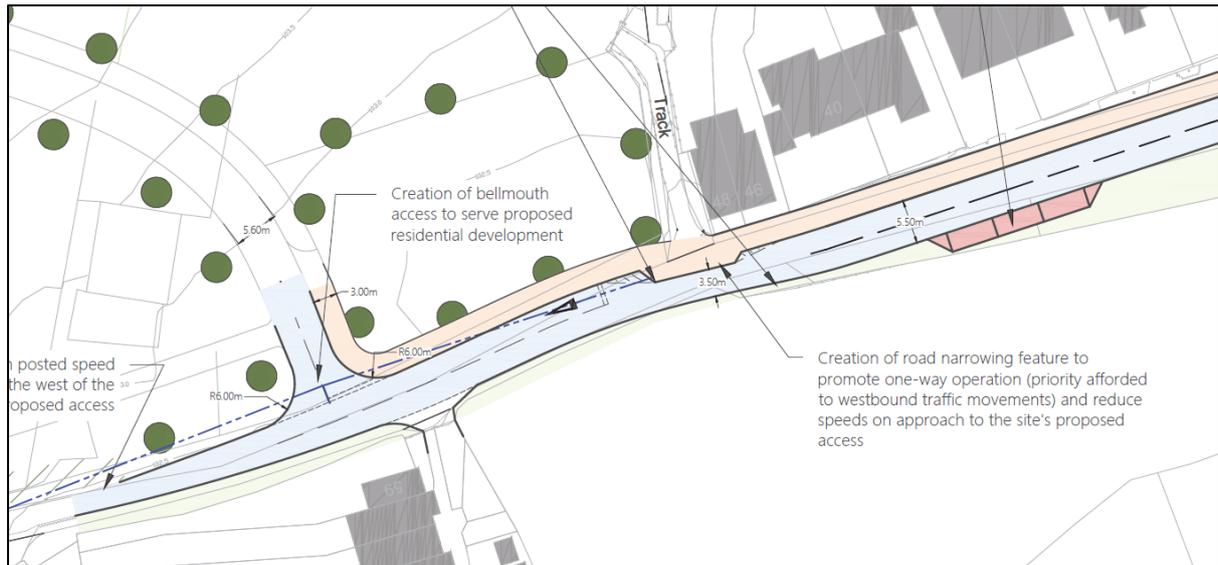


Fig 1 Extract from Drawing No. 21-086 / 001 Rev B (Proposed Access Arrangement)

As part of the proposed access design, a short section of the carriageway of Chiswell Green Lane to the east of the site's access would be narrowed to 3.5-metres in width, to promote one-way operation (priority afforded to westbound traffic movements). As stated by the applicant, this feature would influence motorised users to travel at low speeds (i.e. sub-30-mph) in both an east and westbound direction. To be clear, the narrowing also conveniently overcomes the lack of available lane in the area. I assume the narrowing would not be included if it's primary function to create more space for the cycling facility was not necessary. However, I agree it is a useful addition in this situation because with greater attention to detail/design it can/should also make a feature of the right of way (St Stephen 082) which must also be upgraded to form a main pedestrian access to the development. However, further detail is required to ensure footpath 082 is upgraded to reflect the most direct route for cyclists and pedestrians accessing the development.

The applicant suggests that the extent of the existing 30mph speed limit would also be extended to a point beyond the west of the site's proposed access to ensure car drivers are afforded sufficient inter-visibility with other motorised and non-motorised users. As stated in HCC's Strategy a speed limit in isolation will not necessarily influence all driver's behaviour. We agree a minor shift in location of the terminal signs will suit the proposed layout and is likely to align with HCC speed limit requirements. However, Automatic Traffic Counter (ATC) survey demonstrate that the speed limit change is a supported complimentary measure, not a requirement to make the access acceptable.

As discussed at the pre application stage, the section of Chiswell Green Lane to the west would remain unchanged/maintained as a quiet rural lane. This is intentional. The quiet,

narrow rural nature of the western section provides a natural deterrent which discourages 'rat running'. This view is supported by traffic surveys which indicate relatively minor use of the route which aligns with the general lack of clear destinations that would lead to rat running traffic. It is noted that there are a several properties within the first section of Chiswell Green Lane which are not currently fully operational, the additional traffic generated that may be generated by these land uses is not consider sufficient to lead to a severe impact on the route.

The design of the proposed access would require the full utilisation of land classified as public highway (see Fig 2), and result in the displacement of parked vehicles, likely to be in association with property in Chiswell Green Lane. To compensate for the loss of off-street parking, the design includes the provision of 3 parallel parking bays within a section of the public highway located off the southern side of the carriageway. The planning authority are alerted the requirement to remove two mature trees to provide these spaces in this location. Judging by the condition of the verge in this location the area appears to be used by more than three vehicles. We are concerned that three spaces will be an under provision leading to displaced parking becoming a nuisance. Either additional parking spaces or greater parking control will be necessary.



Fig 2 Extract from plan showing land classified as public highway

To inform the design and optimum position of the access, the 85th percentile speeds from the ATC survey in Chiswell Green Lane, was used to calculate the required visibility splays based on the stopping sight distance formula, as set out in the DfT's 'Manual for Streets 1' (MfS1) publication.

The applicant has shown that the design of the proposed access can achieve visibility splays in excess of the observed speeds and the stopping distance parameters set out in the DfT's MfS1 publication, it is considered that car drivers would be afforded sufficient inter-visibility with other road users, thereby enabling safe manoeuvres to be undertaken at the two-way priority junction with Chiswell Green Lane.

### Shared Foot / Cycleway

The design of the proposed main access would also incorporate a shared foot / cycleway measuring 3.0 metres in width on the eastern side of the proposed access road (See Fig 1). This would connect to a new shared foot/cycleway running in an easterly direction along the full length of the northern side of Chiswell Green Lane and tie into existing infrastructure

either side of the double mini-roundabout junction of the B4630 Watford Road/Tippendell Lane (see Fig 3). The improvements at the double mini roundabout are shown 'in principle', further extensive work will need to be carried out to ensure attractive enhanced environment is delivered.

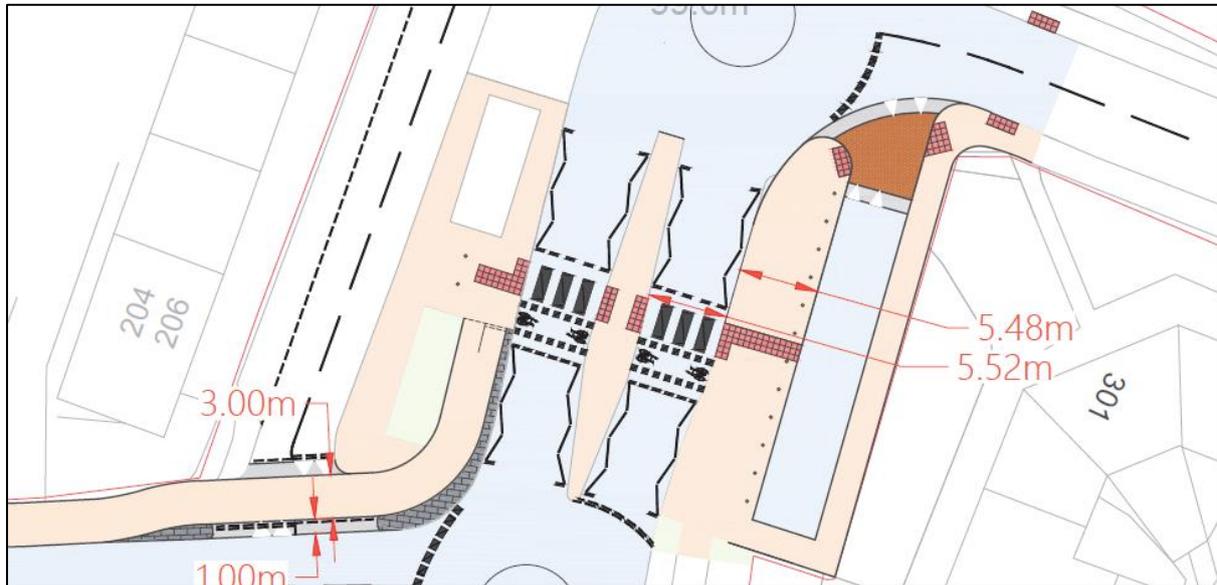


Fig 3 Extract from Drawing 21086 002 (Proposed Highway Amendments)

As shown on Drawing No. 21-086 / 002, the width of the carriageway way of Chiswell Green Lane would be reduced to 5.5-metres, to accommodate a raised table feature at the intersection with Stanley Avenue (Fig 4) and allow priority to be afforded to pedestrians and cyclists over motorised users. Further it would enable existing trees and a telegraph pole currently located in the highway verge to be retained. The provision of this feature would also arguably discourage future households from 'rat-running' via Stanley Avenue, in attempting to gain access to the B4630 Watford Road through bypassing the double mini-roundabout junctions.

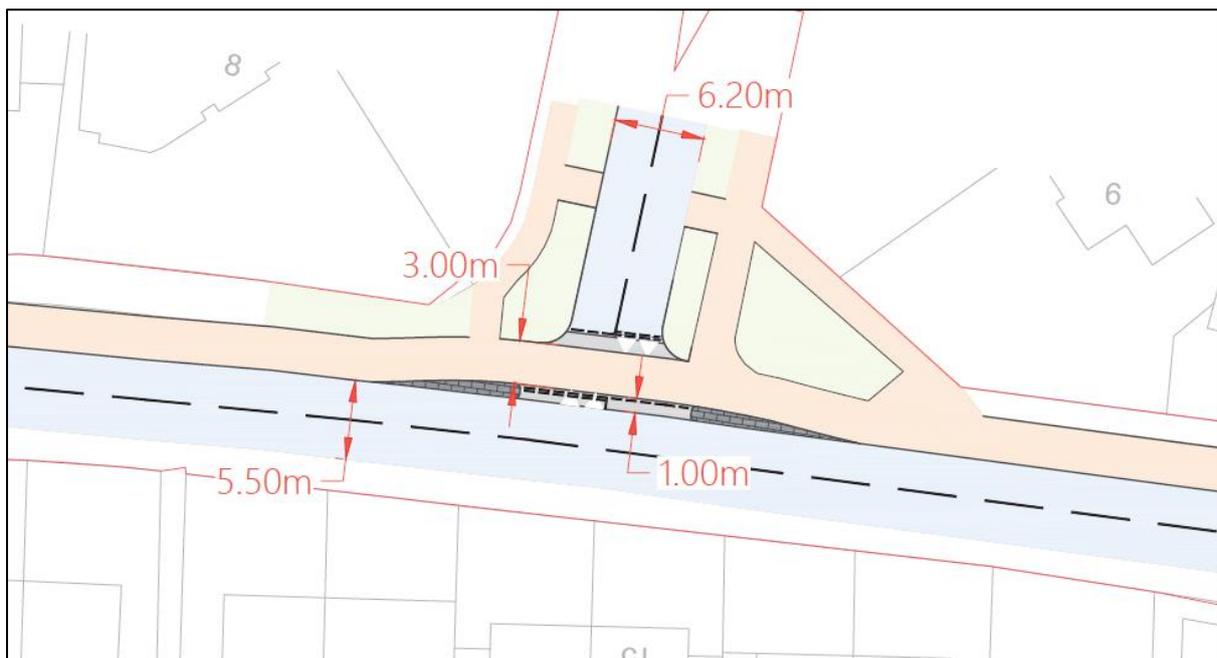


Fig 4 Extract taken from Drawing 21086 002 (Proposed Foot/Cycle Enhancements (Sheet 1 - Stanley Ave)

## **Watford Road junction with Chiswell Green Lane and Tippendell Lane**

A similar raised table feature would be provided at the junction of Chiswell Green Lane and Watford Road (Minor), the latter providing direct access to the parade of shops located off the western side of the B4630 Watford Road. It is proposed that the shared foot/cycleway would extend around the northwestern corner of the mini-roundabout junction of the B4630 Watford Road/Chiswell Green Lane, prior to adjoining an upgraded Zebra Crossing positioned on a raised table.

The footway located along the eastern side of the Zebra Crossing would be upgraded to a shared foot/cycleway and widened to circa 5.5-metres in width. This would continue in a north-easterly direction to a shared space raised table at the junction of Tippendell Lane and access road serving the parade of shops situated off the eastern side of the B4630 Watford Road. Bollards would be installed at the back edge of the shared foot/cycleway to prevent encroachment from motorised users accessing the local shops.

The footway along the eastern side of the access road serving the local shops would comprise of dropped kerbs to enable vehicles to enter and exit the area of hardstanding that is used for parking, adjacent to the main entrances.

It is agreed that the provision of this new infrastructure would enhancement the area and provide a convenient, safe walking and cycling route to public transport infrastructure/services as well as a range of amenities available in Chiswell Green village centre and a good starting point to longer journeys.

The concern is that the applicant has not taken the process further, at the pre application stage we asked the question, what are the typical/routine destinations residents need to reach and why? How can the proportion of car journeys used to make those journeys be replaced by walking, cycling and public transport? The applicant has made a connection to the neighborhood centre, we would require consideration of other destinations slightly further afield and fully understand and where necessary overcome the barriers deterring active or public transport as a first choice.

## **Secondary Access**

A secondary emergency vehicle access measuring circa 5 metres in width would be located off the western side of The Croft. The applicant states that pedestrians and cyclists would be prohibited from using the emergency vehicle access. It is not made clear why this access includes this restriction and it is difficult to understand how in practice this will work. The LHA would encourage all developments of this nature to maximise permeability to help fully integrate development to the adjacent network.

It is assumed the route will be constructed using tarmacadam or similar. However, the appearance/junction/boundary treatment are not made clear.

## **Internal Layout**

It is noted that the application is for outline planning permission. Although an indicative layout is included in our experience subsequent revisions are likely to lead to different layout and unit mix. As the applicant states, it's reasonable to assume the internal layout will be subject to further master planning and no doubt the final layout can reflect the principles of MfS1 and Policy 1 of HCC's LTP4. Ultimately good design will create a layout with safe routes for vehicular traffic, but which ultimately promotes the interests of residents as pedestrians and cyclists, providing optimal access to local amenities and sustainable

transport connections. Naturally, the aim is to encourage the use of walking and cycling within the proposed development and to surrounding amenities. Ideally, this will be achieved by combining the provision of new and improved infrastructure and with the implementation of a Residential Travel Plan.

## **Parking**

In general terms, the LHA does not apply detailed parking policy at a parking ratio level. In line with the theme of HCC's Local Transport Plan we acknowledge the relationship between parking provision and car ownership and would therefore support low parking ratios if underpinned with sustainable location and genuine opportunity of sustainable transport choices.

Clearly, cycle parking ratios should exceed ratios. In addition, storage facilities for cycles must be a key consideration of subsequent detailed revisions.

## **Trip Generation**

The applicant has used TRICS database to establish the predicted person/multi-modal trip generation. The results show that the development proposals would have the potential to generate in the order of 2,584 two-way person trips over the course of a typical weekday including 296 and 242 during the AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods, respectively.

The assessment goes on to establish that approximately three quarters (75%) of all households living within the area surrounding the site are dependent on travelling by private car for their journey to/from various workplace destinations, 13% regularly travel by public transport. Approximately 6% travel by the 'active' modes (walking and cycling).

Normally, an assessment of the impact of development on the local road network is carried out against the morning/evening peak hours. In this case, the development proposals is predicted to generate in the region of 296 and 242 two-way person trip movements during the AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods respectively. Of these, approximately 223 and 182 would comprise private car trips, 38 and 31 by public transport and 17 and 14 by the 'active' modes of walking and cycling.

## **Trip Distribution**

The predicted distribution of vehicular traffic movements likely to be generated by the development proposals has been based on origin-destination dataset 'Location of Usual Residence and Place of Work from the 2011 Census.

Firstly, it is evident that the majority (96.8%) of vehicular traffic generated by the development would travel in an easterly direction along Chiswell Green Lane towards the double mini-roundabout junctions with the B4630 Watford Road/Tippendell Lane. This would equate to a total of 218 and 178 two-way vehicular movements during the weekday AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods, respectively. Only a small proportion (3.2%) of vehicular traffic, equating to 4 two-way movements would travel to/from the proposed development via the western/rural section of Chiswell Green Lane.

Beyond the mini-roundabout junction of the B4630 Watford Road/Chiswell Green Lane, approximately 66% of vehicular traffic would head in a northerly direction. On reaching the mini-roundabout junction of B4630 Watford Road/Tippendell Lane, approximately 43% of vehicular traffic would turn right and head in a south-easterly direction along Tippendell Lane

and the A405 North Orbital Road. A total of 23% of vehicular traffic would head in a northerly direction along the B4630 Watford Road.

Approximately 32% of vehicular traffic (equivalent to 71 and 58 two-way movements) would head in a north/southbound direction along the B4630 Watford Road to/from The Noke Roundabout junction.

### **Highway Capacity Impact**

Assessing the impact of the development on the capacity of the network is routinely set against five years post application (2026), taking into account background traffic growth and any significant committed development. It is acknowledged that the local road network in the vicinity of the development the double mini roundabout junction is a busy junction and during peak times can suffer from a level of congestion. The results from the baseline model scenario demonstrates the area being close to normal operating capacity.

The development proposals are anticipated to generate in the order of 71 and 58 two-way vehicular movements along the B4630 Watford Road during the weekday AM (08:00 – 09:00) and PM (17:00 – 8:00) peak hour periods, respectively. In comparison with the observed baseline traffic flows, this equates to circa 5%. It was agreed with the applicant it is not considered necessary to assess the impact of the development proposals on the 4-arm Noke roundabout junction. It is noted that congestion at this junction is largely associated with tailbacks caused by M25(J21a).

Regarding Watford Road/Chiswell Green Lane/Tippendell Lane double mini-roundabout junction within the future 2026 scenario, there is a predicted a material worsening on the operational performance of all arms of the junction during the weekday AM (07:45 – 08:45) and PM (17:15 – 18:15) peak hour periods, respectively.

It was acknowledged during the pre-application discussions with the applicant, due to the lack of highway boundary available on either side of the double mini-roundabout junctions, there is little or no scope to enhance the performance of the double mini-roundabout junctions through increasing the entry width and effective flare length of several of the approach arms.

Notwithstanding this, the applicant points out that development proposals would deliver substantial enhancements to the walking and cycling environment in Chiswell Green village centre. The theory being that the provision of pedestrian and cycle infrastructural measures would provide a more balanced travel demand for future households and visitors to the proposed development, in accordance with the main aspirations of national, regional, and local planning policy, most notably the NPPF and Policy 1 of the HCC's LTP4). We would agree with this approach and in many cases, creating additional highway capacity is not necessarily the long-term solution in supporting growth in sustainable transport.

With regard to person trip movements undertaken on-foot, It is noted that the applicant commits to enhanced pedestrian and cyclist routes through the provision of a shared foot/cycleway along the full length of the northern side of Chiswell Green Lane, which would provide convenient, direct, and safe access on-foot and by cycle to local public transport infrastructure/services and range of amenities situated in Chiswell Green village centre.

The applicant claims the development is within walking distance of bus stops located either side of the B4630 Watford Road and Tippendell Lane which are served by frequent bus services to a host of local and regional destinations. However, in support of the overarching need to increase bus patronage to reduce car use, access to bus routes is a key consideration. HCC's highway design guide states that '...bus stops should be located so

that the maximum walking distance from any dwelling is 400m'. Although at this stage the internal layout is only indicative clearly the distance between bus stops in Watford Road is greater than 400m. The applicant reiterates predicted patronage to be in the region of 37 and 30 two way movements by public transport during the AM (08:00 – 09:0) and PM (17:00 – 18:00) peak hour periods, it is considered that this demand can be easily accommodated on existing bus routes (based on the existing resident's modal split). We would not disagree with this assessment, but we should not lose sight on the fact that we are seeking to improve the existing situation by increasing the proportion of residents using bus services. The applicant's Travel Plan predicts the new residents will increase their bus use by 4% over the first five years. By retaining the current level of bus service and expecting a new community (which are potentially a greater distance from the services compared with existing residents) suggests we are going to fail to achieve this objective. Further investigation into how access to bus services, and bus services will be improved in support of this proposal.

### **Mitigation Summary**

Clearly the applicant has considered the hierarchical approach of LTP4 Policy 1 as a key feature of the proposal ensuring that priority is given to more sustainable forms of transport and opportunities to reduce demand to use private cars.

The applicant claims to have '...set out a package of measures in the form of a Movement & Access Strategy that is a series of tailored transport solutions to ensure that places of residence, work and leisure within the site are fully accessible but also ensures efficient, reliable, and legible travel connections to existing settlements and transport hubs, encouraging sustainable travel choices and removing physical and psychological barriers to movement.' Unfortunately, we have not arrived at the same conclusion.

The submission goes on to state that '...the Movement & Access Strategy delivers a package of mitigation that combines hard interventions (infrastructure such as improved footways, cycleways and crossing facilities) and soft interventions (travel planning, promotions, and marketing) to achieve meaningful changes in travel behaviour and an ambitious shift in modal share targets.', a position we would also like to reach but at this stage it is a statement that we cannot agree with.

Throughout pre-application discussions we acknowledged the difficulty in increasing capacity at the Watford Road double mini roundabout junction, and, in any case, in line with our policies we suggested the applicant should concentrate on reducing the reliance on private car. As a result, off-site works are proposed to enhance the pedestrian and cycling environment around the double mini-roundabout junction.

As acknowledged by Table 3.2 (Transport Assessment) the applicant highlights the relationship between Chiswell Green and the St Albans City. The applicant lists secondary education, leisure and retail all beyond normal walking distances but well within cycling and bus (journey to work census suggests in the region of 20% of new residents will travel in this direction).

It is noted that the applicant has considered a link to local facilities, but it will be necessary to investigate routes beyond junction with Watford Road. National planning policy states that we should ensure that, '...appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and it's location' (NPPF, 110 a)). Accepting the clear links with St Albans City we would expect an investigation into the links between city and the site, what barriers exist, in particularly to cycling, and how can they be overcome?

## **Planning Obligations**

As you are aware HCC have recently published our 'Guide to Developer Infrastructure Contributions', the Transport section includes the consideration of our two strand approach to securing appropriate supporting infrastructure. At this stage this policy has not been considered by the applicant and is integral to the discussion relating to sustainability.

## **Conclusion**

At this stage the local highway authority recommends the planning application is refused for the following reason:

The proposal fails to comply with Hertfordshire County Council's Local Transport Plan policies relating to sustainable development (Policies, 1. Transport User Hierarchy, 5. Development Management), specifically, further explanation regarding bus services and access to bus services is required and further investigation into cycling infrastructure beyond Chiswell Green local shops.

## **Signed**

James Dale  
February 2022

---

**From:** James Dale [mailto:James.Dale@hertfordshire.gov.uk]  
**Sent:** 16 August 2022 16:37  
**To:** Andrew Wright <Andrew.Wright@stalbans.gov.uk>  
**Cc:** Oliver Sowerby <Oliver.Sowerby@hertfordshire.gov.uk>  
**Subject:** RE: 5/2021/3194 - St Stephens Green Farm - 330 houses

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Andrew

Thank you for forwarding the relevant information. You may be aware that since my initial response to the above planning application (5/2021/3194 - St Stephens Green Farm - 330 houses) which included the following reason for refusal, we have been in dialogue with the applicant.

*The proposal fails to comply with Hertfordshire County Council's Local Transport Plan policies relating to sustainable development (Policies, 1. Transport User Hierarchy, 5. Development Management). Specifically, further explanation regarding bus services and access to bus services is required and further investigation into cycling infrastructure beyond Chiswell Green local shops.*

In response, the applicant produced a Transport Assessment Addendum to supplement the original submission. The addendum includes additional clarification and supporting measures which overcome the points I have previously raised. Therefore, I confirm the local highway authority wishes to remove the previous recommendation for refusal.

Naturally, the applicant's supporting infrastructure and financial contributions need to be matters covered in detail within a s106 agreement. The assumption is HCC, as local highway authority, will be a party involved in the preparation of the document should the planning application progress. In addition, should the planning application be considered for grant of planning permission the local highway authority will provide a series of planning conditions.



**James Dale**  
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**Environment & Transport**  
**Hertfordshire County Council**  
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For service information relating to Coronavirus please visit  
[www.hertfordshire.gov.uk/covid19](http://www.hertfordshire.gov.uk/covid19)



## Appendix MTP2



## National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Martin Fellows (Regional Director)  
Operations Directorate  
East Region  
National Highways  
[PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk)

To: St Albans City & District Council

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** 5/2021/3194

**Location:** St Stephens Green Farm Chiswell Green Lane St Albans Hertfordshire

**Proposal:** Outline application (access sought) for demolition of existing buildings, and the building of up to 330 discounted affordable homes for Key Workers, including military personnel, the creation of open space and the construction of new accesses and highway works including new foot and cycle path and works to junctions

Referring to the consultation on a planning application dated 4 August 2022 referenced above, in the vicinity of the A414 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A).
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons).~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A).~~
- ~~d) recommend that the application be refused (see reasons at Annex A).~~

Highways Act 1980 Section 175B is/is not relevant to this application.<sup>1</sup>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our License.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

<b>Signature: J.Searle</b>	<b>Date: 30/09/2022</b>
<b>Name:</b> Jen Searle	<b>Position:</b> Spatial Planner
<b>National Highways</b> National Highways   Woodlands   Manton Lane   Bedford   MK41 7LW	

## Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendation with regard to planning application 5/2021/3194 and has been prepared by Jen Searle, Spatial Planner for National Highways.

The proposed planning application seeks to develop 330 dwellings off Chiswell Lane which equates to a total 296 and 242 two-way trips in the AM and PM Peaks respectively.

NH are responsible for the monitoring, management, and maintenance of the SRN. Within the vicinity of the proposed development, the primary junctions of interest to NH are M25 Junction 21a to the south of the site, and the A414/North Orbital Road/ Watling Street ('Park Street') Roundabout to the northeast of the site.

The proposed distribution of the development is assigned to be the following:

- 30.3% travelling north to the A414 / N Orbital / Park Street Roundabout equating to 89 and 73 two-way trips in the AM and PM peaks
- 31.6% travelling south the M25 Junction equating to 94 and 76 two-way trips in the AM and PM peaks

On 6<sup>th</sup> September National Highways requested that further information should be provided to understand the impact on the M25 Junction 21A and Park Street Roundabout in line with the Circular 02/2013.

### M25 Junction 21A

On 26<sup>th</sup> September, National Highways were provided information for another neighboring application which presented the existing queuing and general traffic conditions on the M25. While no full junction capacity assessment was undertaken, this additional data has provided confidence to National Highways the proposed development would not have a detrimental impact on the slip roads and therefore has no further comments regarding this matter.

### Park Street Roundabout

National Highways have sought information from the Local Roads Authority who has confirmed they do not have any modeling or recent drawings of the proposed mitigation, but are content, the proposed development will have no detrimental impact on the roundabout. As the LRA have responsibility over four of the five arms National Highways will accept their findings.

Considering the above, National Highways offer no further objection to this application.

**National Highways Planning Response (NHPR 21-09) September 2021**

## Appendix MTP3

**From:** Oliver Sowerby [mailto:Oliver.Sowerby@hertfordshire.gov.uk]  
**Sent:** 07 November 2022 09:55  
**To:** George Burgess <George.Burgess@stalbans.gov.uk>  
**Subject:** RE: Land South of Chiswell Green Lane - 5/2022/0927

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi George,

I did discuss this with James at the end of last week.

I can confirm that the fundamental principle of accepting a sustainable transport scheme over and above a highway capacity solution (which the report majors on), is one that we remain content with.

I note that a new consultation has been issued for this site. However, I don't think this has any highways/transportation impacts?

Thanks,

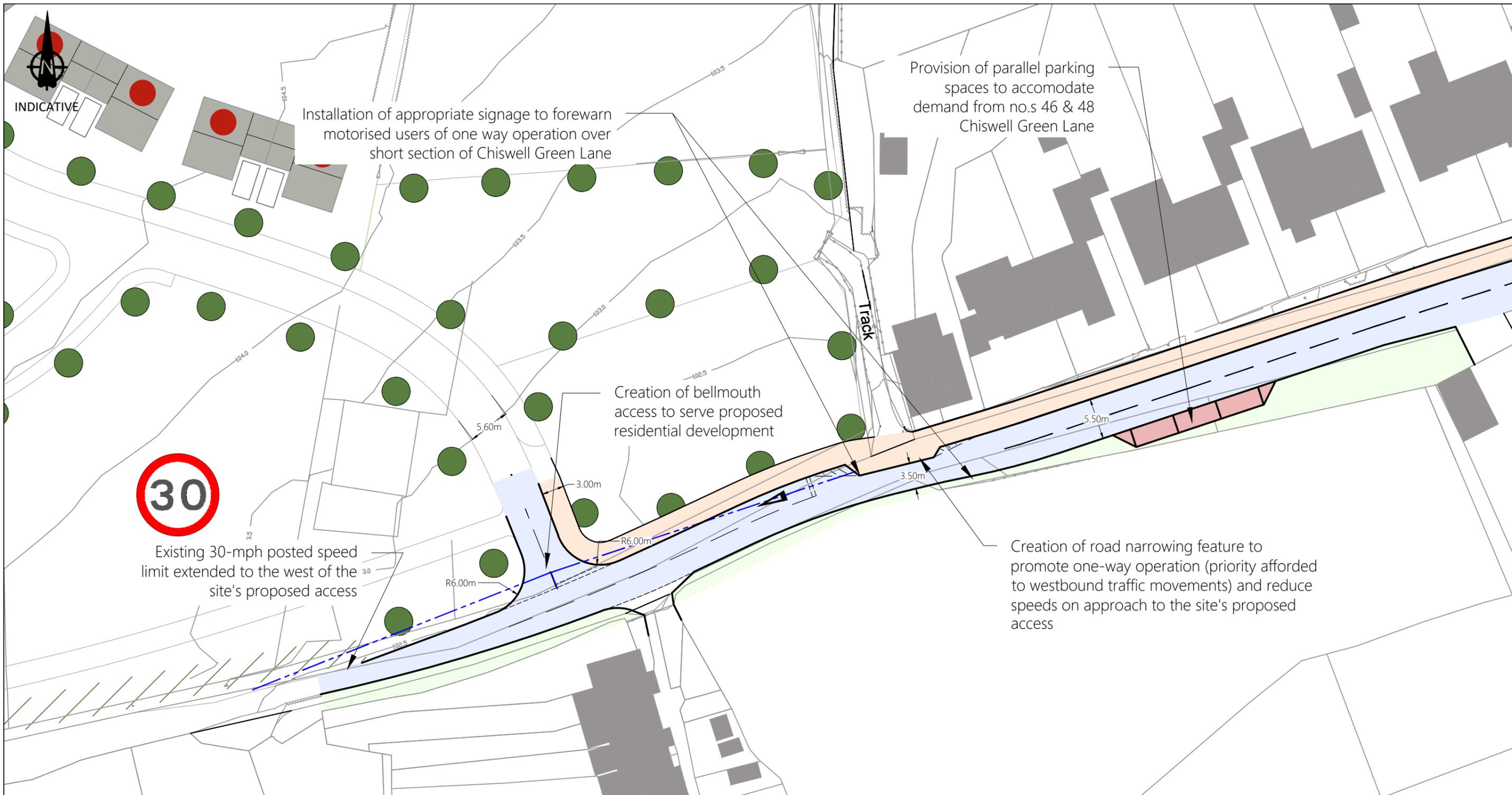
Oliver



**Oliver Sowerby**  
**Senior Development Officer | Development Management | Environment & Infrastructure**  
**Hertfordshire County Council**  
County Hall, Pegs Lane, Hertford, SG13 8DE, Postal Point: CHN213  
**T:** 01992 658148 (**Internal:** 58148) 07527 577 209  
**E:** oliver.sowerby@hertfordshire.gov.uk



## Appendix MTP4



**Notes**

Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.

Ordnance Survey Licence number: 100057360

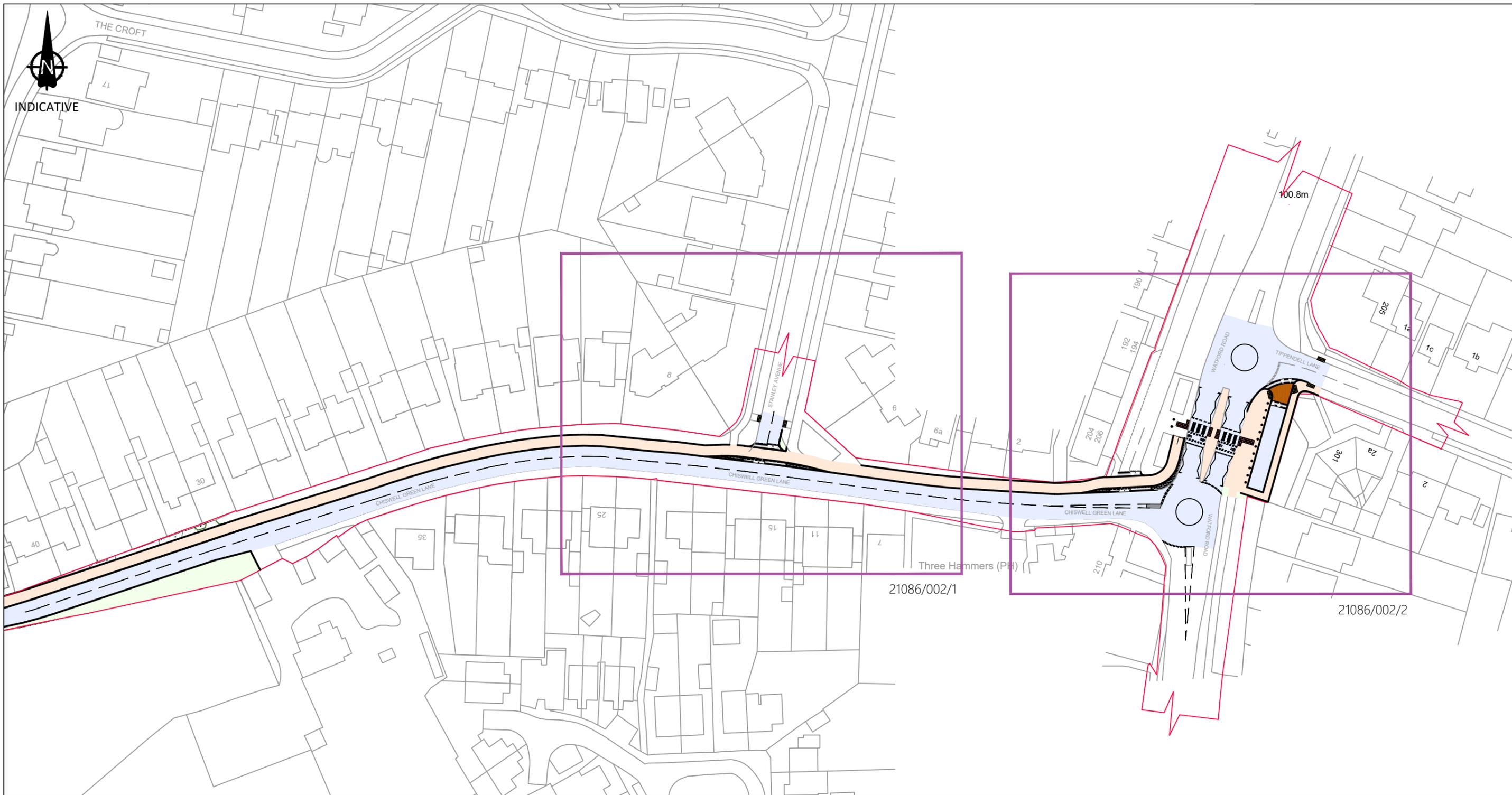
 Proposed Shared Foot/Cycleway	 Proposed Parking Spaces	 Visibility Splay (2.4-metres x 43-metres)
 Proposed Realigned Carriageway	 Highway Boundary Extent	
 Highway Verge		

Drawing Revisions			
Rev.	Drn.	Date:	Details
-	OH	20/04/2021	First issue
A	EH	27/07/2017	Updated Layout w/ Topo Survey Base
B	EH	11/11/2021	Updated Layout Plan

<b>Client</b>	
Headlands Way Limited	
<b>Project</b>	
Land North of Chiswell Green Lane, Chiswell Green, Hertfordshire, AL2 3AJ	

<b>Title</b>	
Proposed Access Arrangements	
<b>MILESTONE</b> TRANSPORT PLANNING	
Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA Tel: 01483 397888 Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN Tel: 0191 338 7220	
<b>Drawing Number:</b>	<b>Scale:</b>
21086 001	1:500 @ A3
	<b>Revision:</b>
	B



**Notes**

- Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.
- This drawing has been based upon OS Mapping. Milestone Transport Planning cannot be held responsible for any discrepancies which may arise because of it.

	Proposed Shared Foot/Cycle Path
	Proposed Realigned Carriageway
	Highway Verge
	Highway Boundary Extent

Drawing Revisions				Chk:
Rev.	Dwn:	Date:	Details	TW
-	EH	10/05/2022	First issue	

**Client**

Headlands Way Limited

**Project**

Land North of Chiswell Green Lane, Chiswell Green, St Albans

**Title**

Proposed Foot/Cycle Amendments - Chiswell Green Lane, Stanley Avenue, Watford Road

**MILESTONE**  
TRANSPORT PLANNING

Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA  
Tel: 01483 397888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220

**Drawing Number:**

21086/002

**Scale:**

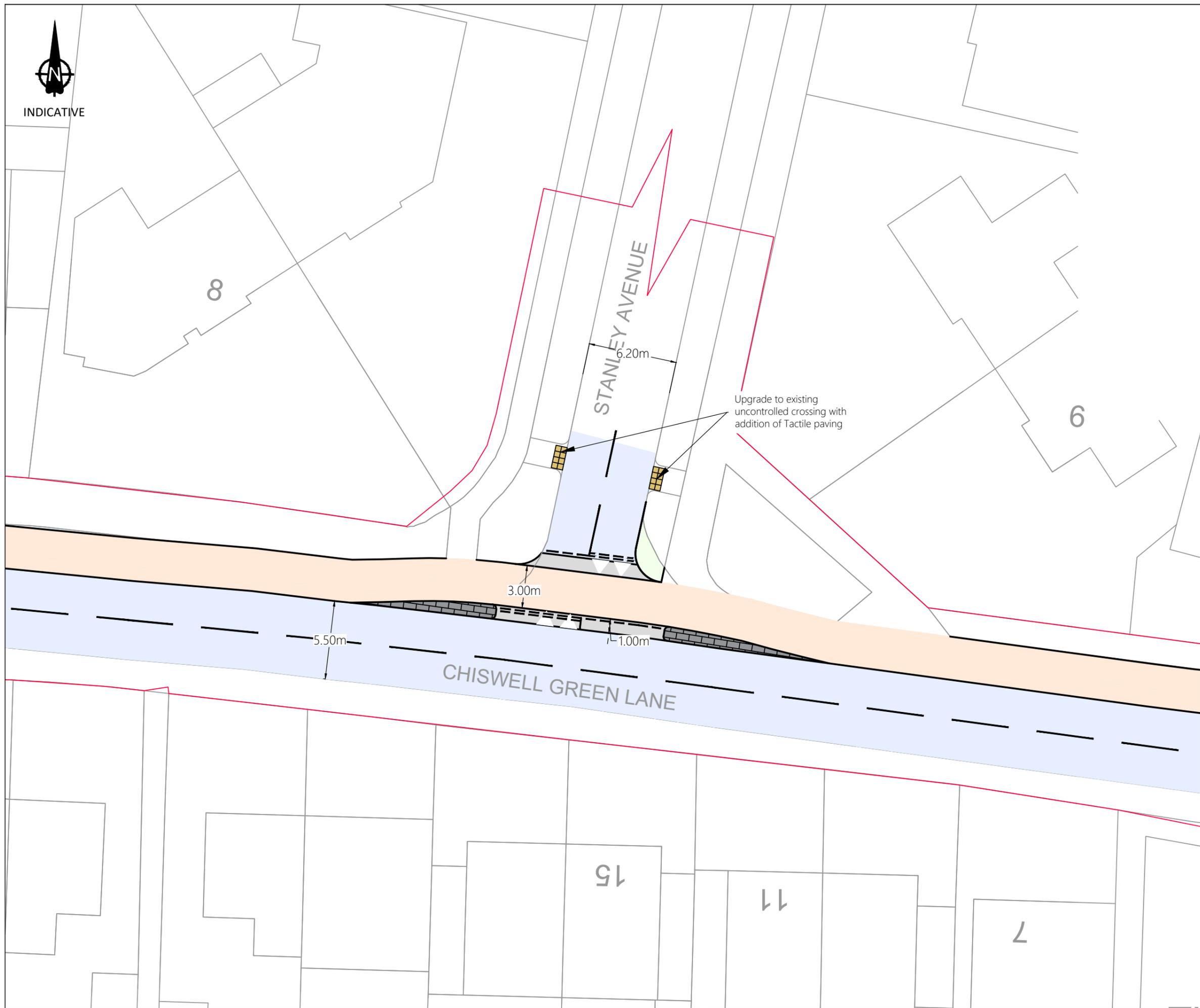
1:1000 @ A3

**Revision:**

-



INDICATIVE



Notes  
Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.

- Proposed Shared Foot/Cycle Path
- Proposed Realigned Carriageway
- Highway Verge
- Highway Boundary Extent

Ordnance Survey Licence number: 100057360

Drawing Revisions

Rev.	Drn:	Date:	Details	Chk:
-	EH	10/05/2022	First issue	TW

Client  
Headlands Way Limited

Project  
Land North of Chiswell Green Lane, Chiswell Green, Hertfordshire, AL2 3AJ

Title  
Proposed Foot/Cycle Enhancements (Stanley Avenue)



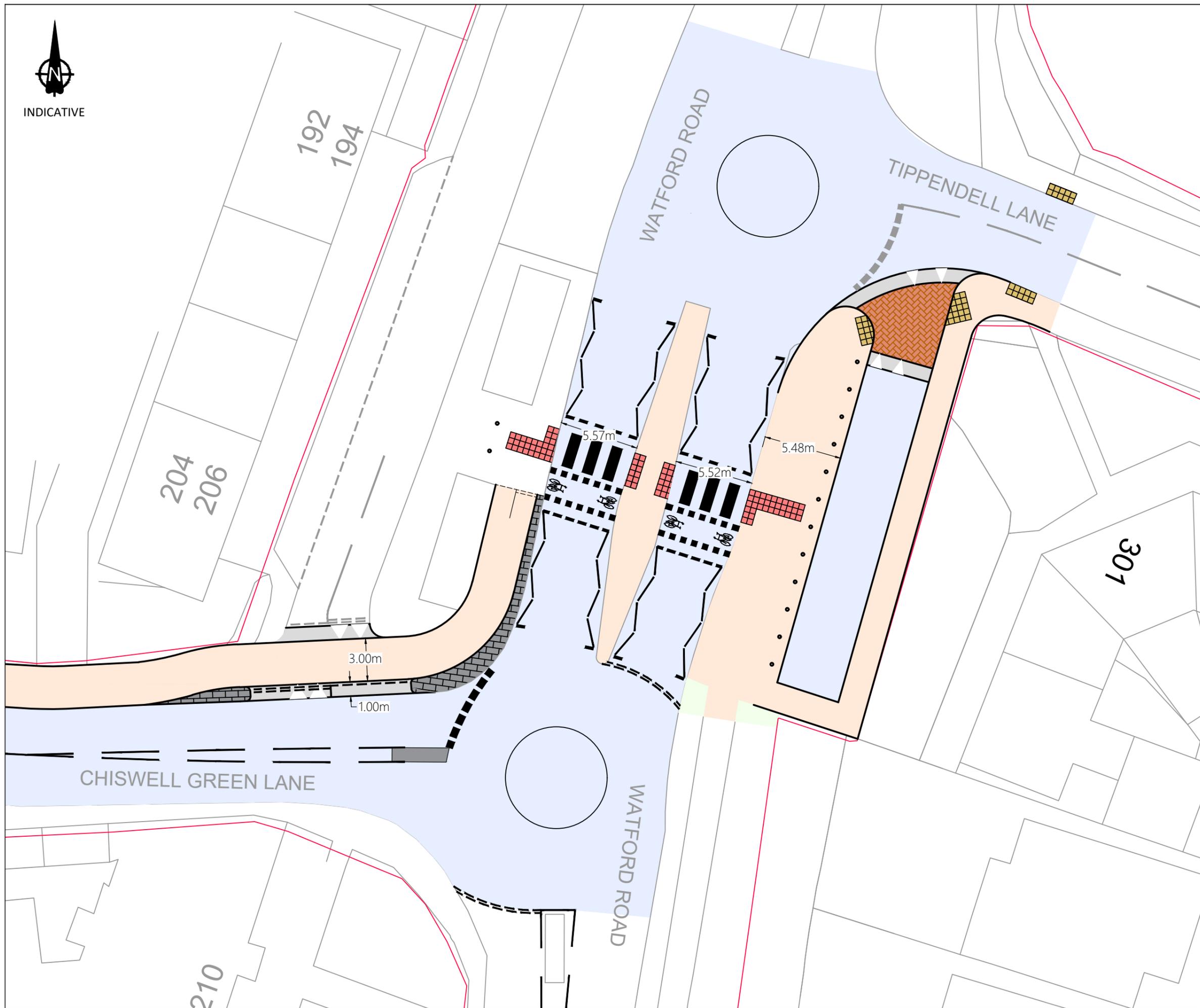
Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA  
Tel: 01483 397888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220  
web: www.milestonetp.co.uk

Drawing Number:  
21086/002/1

Scale:  
1:250 @ A3  
Revision:  
-



INDICATIVE



Notes  
Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.

-  Proposed Shared Foot/Cycle Path
-  Proposed Realigned Carriageway
-  Proposed Highway Verge
-  Highway Boundary Extent
-  Shared Space Raised Table
-  Tactile Paving

Ordnance Survey Licence number: 100057360

Drawing Revisions				
Rev:	Drn:	Date:	Details:	Chk:
-	EH	10/05/2022	First issue	TW

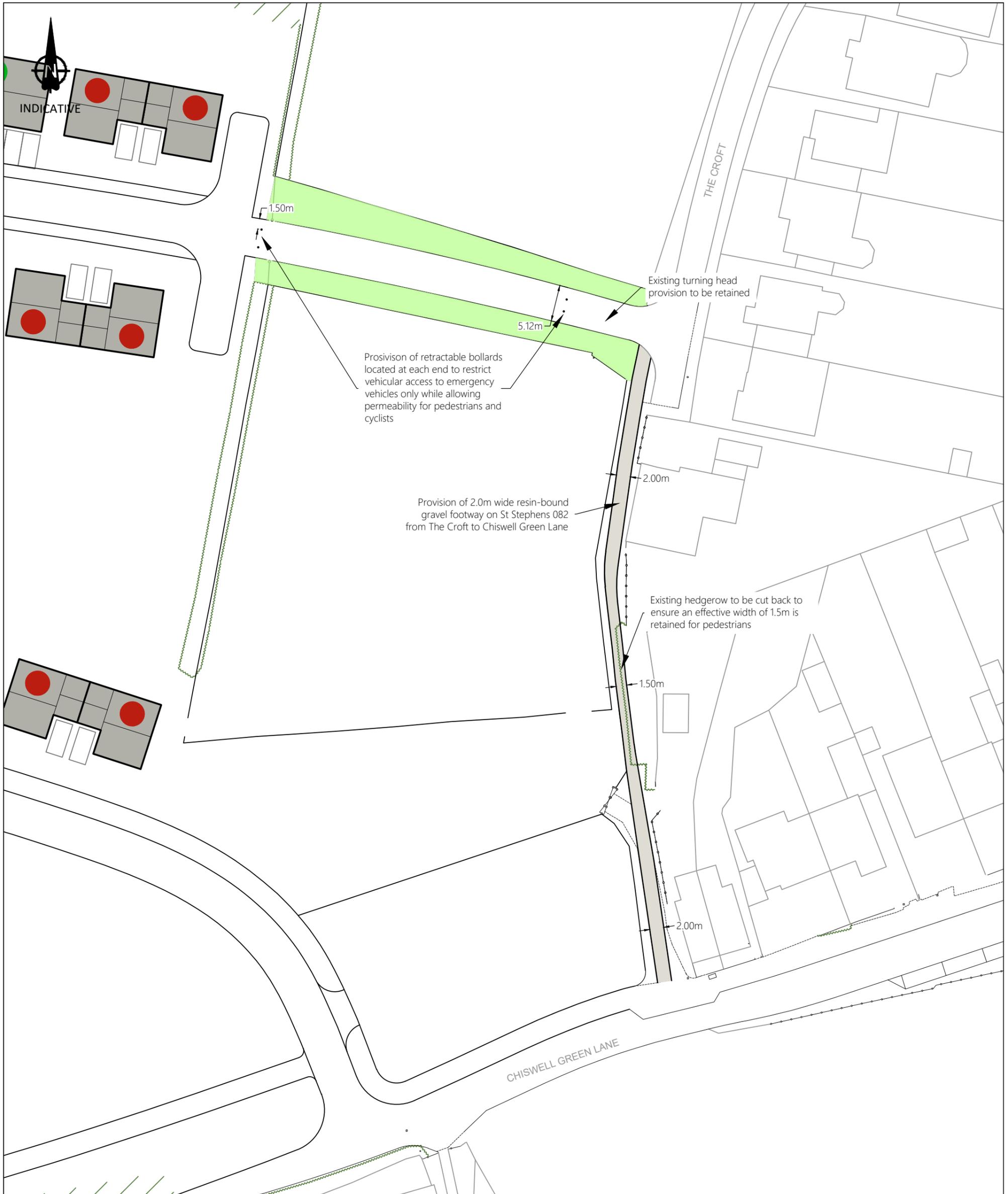
Client  
Headlands Way Limited

Project  
Land North of Chiswell Green Lane, Chiswell Green, Hertfordshire, AL2 3AJ

Title  
Proposed Foot/Cycle Amendments - Watford Road

**MILESTONE**  
TRANSPORT PLANNING  
Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA  
Tel: 01483 397888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220  
web: www.milestonetp.co.uk

Drawing Number:	Scale:
21086/002/2	1:250 @ A3
Revision:	
-	



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Ordnance Survey Licence number: 100057360

	Resin-Bound Gravel Footway
	Soft Landscaping

Drawing Revisions				Chk:
Rev:	Drn:	Date:	Details	TW
-	EH	31/03/2022	First issue	

**Client**

Headlands Way Limited

**Project**

Land North of Chiswell Green Lane, Chiswell Green

**Title**

Proposed PRoW Improvements (St Stephens 082)

**MILESTONE**  
TRANSPORT PLANNING

Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA  
Tel: 01483 397888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220  
web: www.milestonetp.co.uk

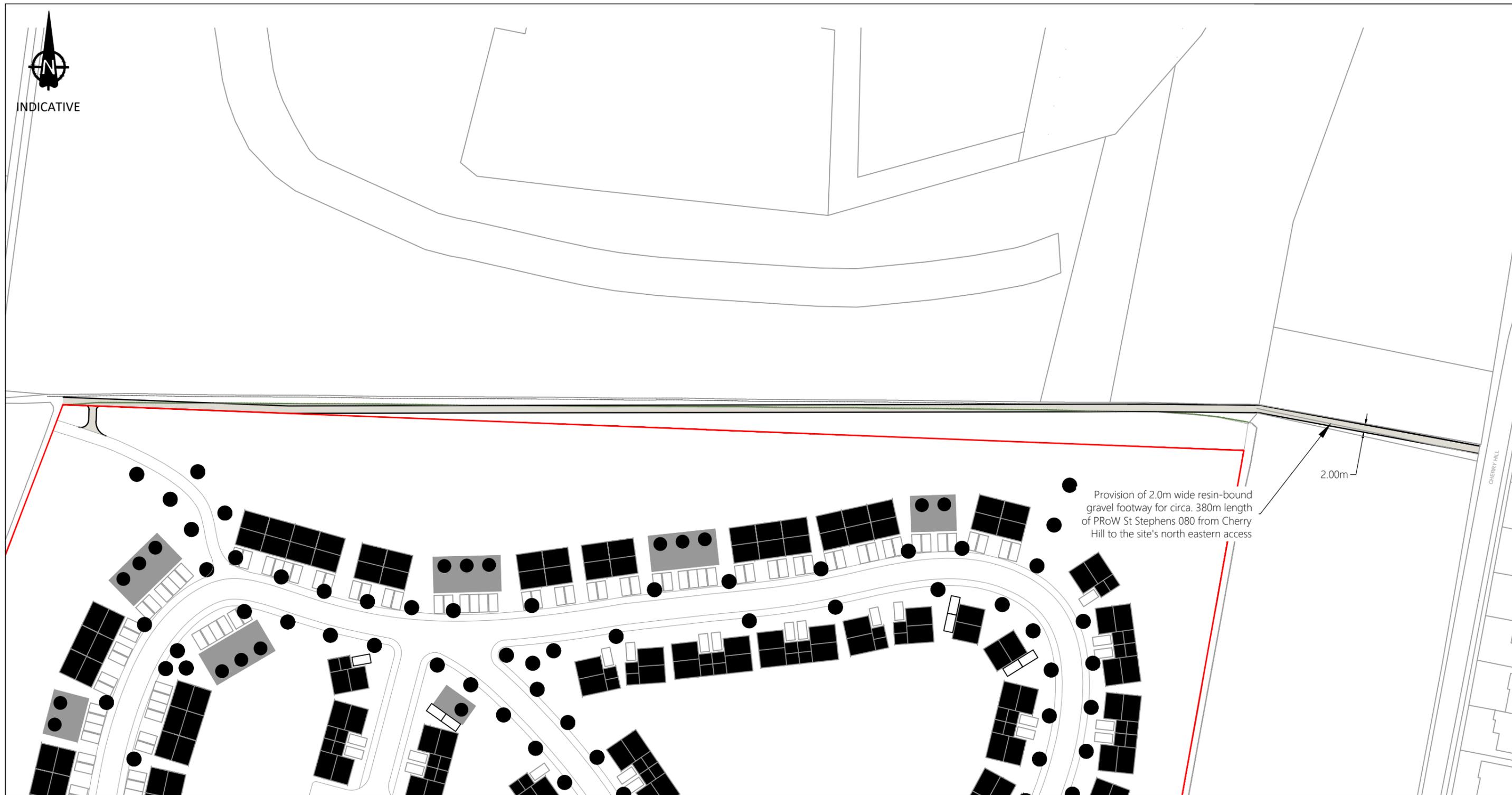
**Drawing Number:** 21086/003

**Scale:** 1:500 @ A3

**Revision:** -



INDICATIVE



**Notes**

- Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.
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Ordnance Survey Licence number: 100057360

Drawing Revisions				Chk:
Rev:	Drm:	Date:	Details	TW
-	EH	31/03/2022	First issue	MS
A	JB	16/03/2023	Revised layout	
<b>Client</b>				
Headlands Way Limited				
<b>Project</b>				
Land North of Chiswell Green Lane, Chiswell Green				

**Title**

Proposed PRow Upgrades  
(St Stephens FP080)

**MILESTONE**  
TRANSPORT PLANNING

7 Ancells Court, Rye Close, Fleet, Hampshire, GU51 2UY  
Tel: 01483 397 888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220

**Drawing Number:**  
22185/004

**Scale:**  
1:1000 @ A3

**Revision:**  
A



INDICATIVE



- Notes
1. Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.
  2. This drawing has been based upon topographical survey information. Milestone Transport Planning cannot be held responsible for any discrepancies which may arise because of it.

- Spaces allocated to residents of Chiswell Green Lane
- Spaces for visitors to Memorial Park

Ordnance Survey Licence number: 100057360

Drawing Revisions				
Rev:	Drn:	Date:	Details	Chk:
-	EH	21/04/2022	First issue	TW
A	JB	16/03/2023	Revised Layout	MS
B	JB	17/03/2023	Revised Layout	TG

Client  
Headlands Way Limited

Project  
Land North of Chiswell Green Lane, Chiswell Green

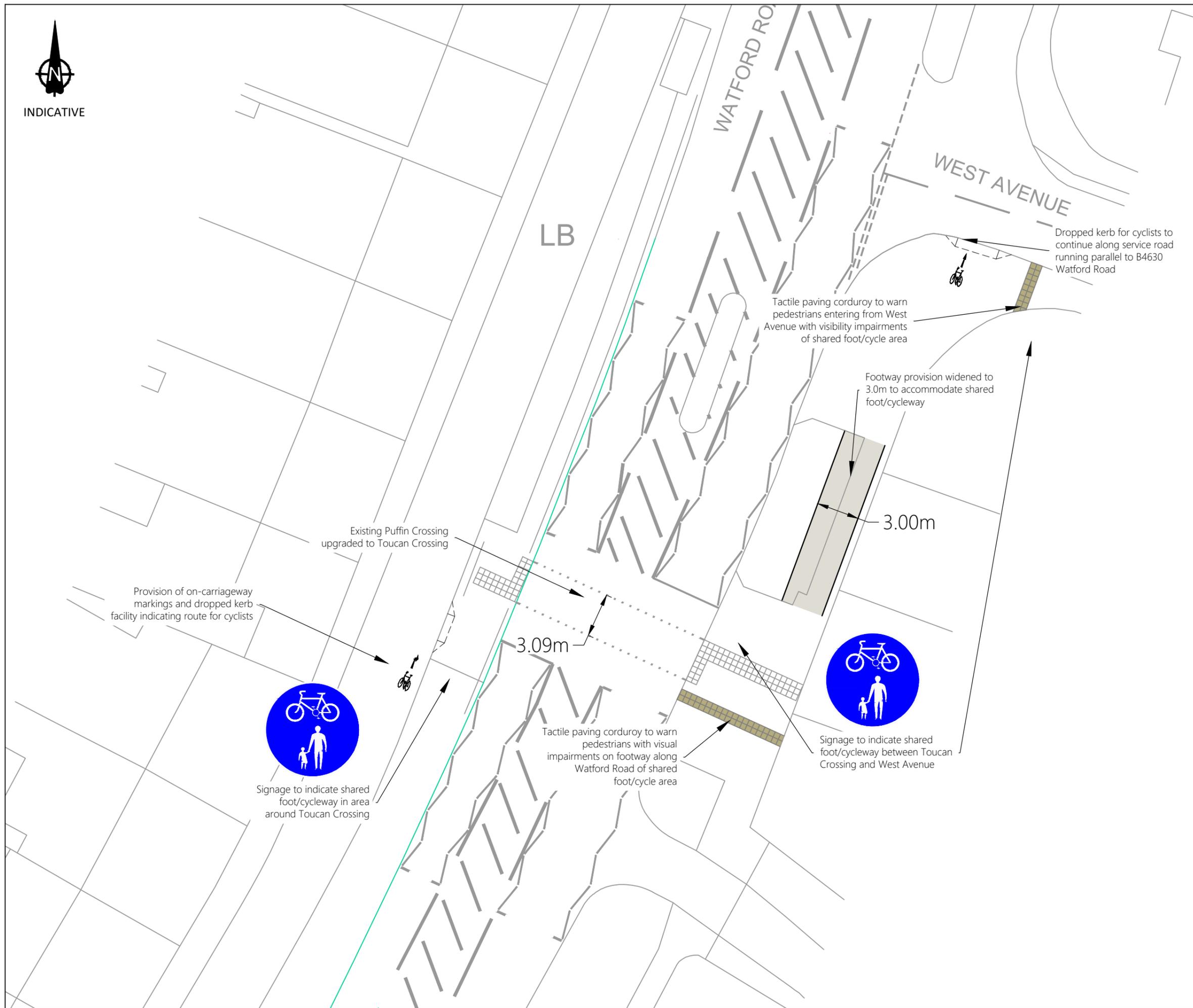
Title  
Proposed Memorial Car Parking Allocation

**MILESTONE**  
TRANSPORT PLANNING  
7 Ancells Court, Rye Close, Fleet, Hampshire, GU51 2UY  
Tel: 01483 397888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220  
web: www.milestonetp.co.uk

Drawing Number: <b>22185/005</b>	Scale: 1:250 @ A3
	Revision: <b>B</b>



INDICATIVE



- Notes
1. Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.
  2. This drawing has been based upon OS Mapping. Milestone Transport Planning cannot be held responsible for any discrepancies which may arise because of it.

Ordnance Survey Licence number: 100057360

Drawing Revisions

Rev.	Drn:	Date:	Details	Chk:
-	EH	22/04/2022	First issue	TW

Client  
Headlands Way Limited

Project  
Land North of Chiswell Green Lane, Chiswell Green

Title  
Proposed Pedestrian/Cycling Upgrades - Toucan Crossing

**MILESTONE**  
TRANSPORT PLANNING

Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA  
Tel: 01483 397888  
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN  
Tel: 0191 338 7220  
web: www.milestonetp.co.uk

Drawing Number:	Scale:
21086/006	1:250 @ A3
Revision:	-